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does not maintain substantial operations in Tennessee. For those reasons, this Court can exercise neither general jurisdiction nor specific personal jurisdiction over Shenzhen Grepow. Accordingly, Plaintiff's Complaint should be dismissed with prejudice.

In addition to the Memorandum of Law and the record in this case, Shenzhen Grepow relies on the following additional materials in support of its Motion to Dismiss:

**Exhibit A:** Declaration of Zhongqiang Xia

**WHEREFORE**, Shenzhen Grepow respectfully requests that this Court issue an Order dismissing Plaintiff's Complaint in its entirety and with prejudice.

Respectfully submitted,

**CARR ALLISON**

BY: /s/ Sean W. Martin

**SEAN W. MARTIN, BPR #020870**

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**CERTIFICATE OF COMPLIANCE WITH THE ORDER**  
**GOVERNING MOTIONS TO DISMISS**

Pursuant to this Court's Order Governing Motions to Dismiss (D.E. 4), the undersigned attorney hereby certifies that the matters at issue in this Motion cannot be resolved through an amendment of Plaintiff's Complaint.

BY: /s/ Sean W. Martin

**SEAN W. MARTIN, BPR# 020870**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2023, I electronically filed the above titled document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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